



PERMIT APPLICATION REVIEW SUMMARY

NH Department of Environmental Services
Air Resources Division
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Facility: Novel Iron Works, Inc.
250 Ocean Road, Greenland, NH 03840
AFS #: 3301590778 **Application #:** 18-0107

Engineer: PRN
Date: November 15, 2018 Page 1 of 8

PROJECT DESCRIPTION

Novel Iron Works Inc. (the Facility) was issued a Title V Permit (TV-049) on February 1, 2016 for spray painting of structural metal components. On January 25, 2018, USEPA issued the memorandum *Reclassification of Major Sources as Area Sources Under Section 112 of the Clean Air Act*. This memorandum nullified the "Once-In-Always-In" policy memo (a.k.a. Seitz memo) dated May 1995 by allowing sources to accept federally enforceable permit limitations to become synthetic minor sources of HAP emissions eliminating the requirement for a Title V Operating Permit and allowing the source to opt out of any applicable MACT (40 CFR part 63 major source subpart) standard. The application requesting synthetic minor status for HAP via a Temporary Permit was received May 25 2018; the letter for completeness was issued June 5, 2018

CHANGES FROM PREVIOUS PERMIT

Temporary Permit template language

Changed stack heights and exhaust sizes due to installation of 4 new exhaust stacks for the spray painting operations

Added PTE limit for HAPs to <10/25 tpy for synthetic minor status

Removed requirements of 40 CFR 63 subpart M (facility will be a synthetic minor source of HAP)

Removed all Title V recordkeeping and reporting requirements

Revised RTAP operating limitations due to new exhaust stacks

Revised emission fee payment schedule and determination of emission fee due to changes in Env-A 700 which became effective October 24, 2018

FACILITY DESCRIPTION

The Facility fabricates and erects structural metal components and supports which are used as framework for building construction in a 90,000 square foot manufacturing area with approximately 10,000 square feet of offices and maintenance shops.

PERMIT HISTORY

<u>Permit #</u>	<u>App #</u>	<u>Description</u>	<u>Issue Date</u>	<u>Expiration Date</u>
TV-049	15-0059	Title V permit renewal	2/1/2016	1/31/2021
TV-049	14-0176	Minor modification to add additional paint spray gun	4/25/2014	6/30/2015
TV-049	14-0035	Minor modification – replacement of the saw house #1 space heater	4/3/2014	6/30/2015
NA	14-0034	Addition of Messer West plasma arc cutting system	3/21/2014	withdrawn
TV-049	08-0483	Title V permit renewal	6/4/2010	6/30/2015

PROCESS/DEVICE DESCRIPTION

Varying lengths, sizes, and shapes of steel are received for processing. Process operations consist of cutting, welding, bonding, and coating various metal pieces to meet architectural specifications. Approximately 40 to 60 percent of the structural steel I-beams and fabricated building supports are painted during the manufacturing process. The coating is used to protect the steel from corrosion and exposure to extreme weather conditions. The coatings are all air dried. The parts are coated in one of three open bay areas of the building using hand-held spray guns. Paint fumes are vented from the building through 4 new stacks, each with its own fan, located on the roof of the building.

The I-Beams are sprayed in a downward direction in a large open area where the floor has a lined gravel bed. A certain type of rock is used to collect overspray. The rocks grow in size overtime and once too large to walk on, are placed in a dumpster and sent to a landfill as non-hazardous material. Local ventilation takes fumes out of work area.

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<u>EU#</u>	<u>Device/ Process</u>	<u>Description</u>
EU01	Bay 1, Bay 2 & Bay 3	Startup date: 1996; Bays are located in the main shop area Three spray guns which can each deliver up to 0.25 gal/min of paint Paint gun #1 – Titan Portable, Model: 941-441 S/N: 11310-00318 Paint gun #2 – Binks, Model: 81241 S/N: BK941041 Paint gun #3 – Binks, Model: MX3042 S/N: 41366-2015

Non-Permitted Activities:¹

<u>Description</u>	<u>Model Year</u>	<u>Max Firing Rate</u>	<u>Fuel</u>	<u>Location</u>
Rapid Model 3054	1986	3.5 MMBtu/hr	NG	Shipping Area Heater
Rapid Model 344	1974	3.0 MMBtu/hr	NG	Main Shop Heater
Cutting & Welding operations ²	NA	NA	NA	NA
Shot blasting		NA	NA	Shop area
Aerozent Y2	1965	1 MMBtu/hr	NG	Angle Dept Heater
Weil McLaine Ultra 230	2004	0.23 MMBtu/hr	NG	Office boiler 1 st floor
Office Closet Heater 2nd floor	1992	0.18 MMBtu/hr	NG	Office closet heater
Trane Model 4610M-4F	2001	0.25 MMBtu/hr	NG	Roof top heater
Dayton Model 3E371	NA	0.15 MMBtu/hr	NG	Maintenance heater
Modine Model PAH130AF	NA	0.13 MMBtu/hr	NG	Shop near drill heater
Modine Model BAH360AF	NA	0.36 MMBtu/hr	NG	Plate dept. heater
Modine Model 3HDS	NA	0.13 MMBtu/hr	Propane	Saw house 1 heater
Halmark Model HSD-140	NA	0.18 MMBtu/hr	No. 2 oil	Saw house 2 heater
York RTU Predator	2014	0.096 MMBtu/hr	NG	Exercise area
Rinnai Model RU98i	2014	0.199 MMBtu/hr	NG	Caf. & Exercise hot H ₂ O
York RTU Predator	2014	0.096 MMBtu/hr	NG	Cafeteria heater

POLLUTION CONTROL EQUIPMENT

The Facility does not use pollution control devices on the spray painting processes.

EMISSION CALCULATIONS

The Facility used mass balance to calculate emissions (see table attachment to application) using paint and coating application rate information from 2017.

HAPs

Actual uncontrolled emissions for the January through December 2017 recordkeeping period as reported by the Facility in the annual emission report were:

<u>HAP</u>	<u>CASRN</u>	<u>Lb/yr</u>	<u>TPY</u>	<u>HAP</u>	<u>CASRN</u>	<u>Lb/yr</u>	<u>TPY</u>
Xylene	1330-20-7	91.76	0.05	Ethyl benzene	100-41-4	20.21	0.01
MDI	101-68-8	325.75	0.16	Hexamethylele-1,6-diisocyanate	822-06-0	1.32	6.6E-4

It should be noted that Hexamethylele-1,6-diisocyanate (HDI; CASRN 822-06-0) is only found in TN032 and TN031 neither of which was reported as used in the 2017 emissions report.

Potential HAP emissions were not calculated since the permit will restrict HAP emissions to less than the major source threshold of 10/25 tpy.

¹ All of these devices/activities are below the permitting thresholds in Env-A 607.01

² The two plasma arc cutters vent inside of the building (i.e. no emissions to the ambient air).

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VOCs

Actual uncontrolled VOC emissions for a 12-month period as reported annually by the Facility were:

<u>Report Yr</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017³</u>
VOCs (tpy)	8.17	4.93	5.20	4.23	5.02

All coatings used in 2017 were in compliance with Env-A 1212.04(a).

Potential emissions for the Facility have not been calculated since the current permit restricts VOC emissions to less than the major source threshold of 50 tpy.

RTAPs

The lb/day emission rates listed in the table below are based on SDS information, coating use rates received with the 2017 annual emissions report, and a calculated spray gun transfer efficiency of 60% [40% overspray]. The emission calculations are based on the maximum concentration of each constituent [RTAP] listed in the SDS, and does not account for coatings, thinners and cleaners shipped off-site for disposal. The compliance determination was performed using the stack configuration and exhaust rates in use in 2017 [i.e. horizontal stacks].

<u>RTAP</u>	<u>CASRN</u>	<u>Lb/yr</u>	<u>Compliance⁴</u>	<u>RTAP</u>	<u>CASRN</u>	<u>Lb/yr</u>	<u>Compliance⁴</u>
Xylene, total	1330-20-7	352	Modeling	Ethyl benzene	100-41-4	116	In-stack
Methylene bisphenyl diisocyanate	101-68-8	48	Modeling	Zinc oxide [RF]	1314-13-2	0.31	In-stack
Silica	14808-60-7	0.032	In-stack	Talc (no asbestos fibers)	14807-96-6	47	Modeling
Titanium dioxide	13463-67-6	43	In-stack	n-Butanol	71-36-3	84	In-stack
1,2,4-Trimethylbenzene	95-63-6	816	Modeling	m-Xylene	108-38-3	8.4	In-stack
Iron oxide [RF]	1309-37-1	89	Modeling	1,3,5-Trimethylbenzene	108-67-8	739	Modeling
Acetone	67-64-1	148	In-stack	MEK	78-93-3	1843	In-stack
p-Xylene	106-42-3	4.2	In-stack	MIBK	108-10-1	0.12	In-stack

RTAPs in shaded cells are also HAPs

The Facility's Title V Permit [TV-049] contains limitations on the use of TN010 coating to maintain compliance with the annual and daily AALs for Methylene bisphenyl diisocyanate [MDI; CASRN 101-68-8] based on modeling performed in 2012 and horizontal exhaust stacks as follows:

- Sprayed in one spray bay in any calendar day; OR
- Limited to 3 hours of spraying in any day (24-hour period) in all three spray bays simultaneously

These limits have been recalculated based on the new stacks (vertical and unobstructed) that were installed in early 2018 for coatings TN010 and TN011 which both contain MDI. Coating usage has been calculated to maintain compliance with the daily and annual AALs⁵.

Stack flowrate (each) = 32,000 acfm # of Stacks = 4 Total flow = 128,000 acfm [32,000 acfm x 4]

$$\frac{128,000 \text{ acfm}}{2119} = 60.41 \frac{m^3}{sec}$$

MDI Ambient Air Limits (AALs): 24-hr = 0.18 µg/m³ Annual = 0.020 µg/m³

TN010⁵

Paint density = 23.8 lb/gal Paint application rate = 0.21 gal/min Spray time = 60 min/job
jobs/day = 1.3 MDI content = 10% 40% overspray 6.3% MDI emitted

³ VOC emissions for 2017 are based on coating use rates as reported by the Facility. All other annual VOC emissions in the table were calculated by ARD Emissions Reporting section.

⁴ Modeling for these RTAPs was performed in 2012 using potential emissions. At that time MDI (CASRN 101-68-8) did not pass and required permit restrictions.

⁵ The number of jobs per day, paint application rate and spray time per job [a "job" consists of a single beam] are based on information supplied by the Facility in 2012 and account for all stages of preparing the beam for coating in one spray bay.

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Daily paint use limit [MDI 24-hr AAL = 0.18 µg/m³]:

$$0.21 \frac{\text{gal paint}}{\text{min}} \times 60 \frac{\text{min}}{\text{job}} = 12.6 \frac{\text{gal paint}}{\text{job}} \times 1.3 \frac{\text{jobs}}{\text{day}} = 16.38 \frac{\text{gal paint}}{\text{day}} \times 23.8 \frac{\text{lb paint}}{\text{gal paint}} = 389.8 \frac{\text{lb paint}}{\text{day}}$$

$$389.8 \frac{\text{lb paint}}{\text{day}} \times 10\% \text{ MDI} \times 40\% \text{ overspray} \times 6.3\% \text{ MDI emitted} = 0.982 \frac{\text{lb MDI emitted}}{\text{day}}$$

$$\frac{0.982 \frac{\text{lb MDI emitted}}{\text{day}}}{\frac{24 \text{ hr}}{\text{day}}} = \frac{0.0409 \text{ lb MDI emitted}}{\text{hr}}$$

$$\frac{\left(0.0409 \frac{\text{lb MDI emitted}}{\text{hr}} \times 126,000\right)}{60.41 \frac{\text{m}^3}{\text{sec}}} = \frac{85.38 \frac{\mu\text{g}}{\text{m}^3}}{700} = 0.12 \frac{\mu\text{g}}{\text{m}^3}$$

Annual paint use limit [MDI Annual AAL = 0.020 µg/m³]:

paint days per year = 55 [5 days per week 11 weeks per year]

$$\frac{55 \text{ days}}{\text{yr}} \times \frac{1.3 \text{ paint jobs}}{\text{day}} = \frac{71.5 \text{ paint jobs}}{\text{yr}} \times \frac{12.6 \text{ gal paint}}{\text{job}} = 901 \frac{\text{gal paint}}{\text{yr}}$$

$$\frac{901 \text{ gal paint}}{\text{yr}} \times \frac{23.8 \text{ lb paint}}{\text{gal paint}} = \frac{21,411 \text{ lb paint}}{\text{yr}} \times 10\% \text{ MDI} \times 40\% \text{ overspray} \times 6.3\% \text{ emitted} = \frac{54.03 \text{ lb MDI emitted}}{\text{yr}}$$

$$\frac{54.03 \frac{\text{lb MDI emitted}}{\text{yr}}}{\frac{8760 \text{ hr}}{\text{yr}}} = \frac{0.00617 \text{ lb MDI emitted}}{\text{hr}}$$

$$\frac{\left(0.00617 \frac{\text{lb MDI emitted}}{\text{hr}} \times 126,000\right)}{60.41 \frac{\text{m}^3}{\text{sec}}} = \frac{12.87 \frac{\mu\text{g}}{\text{m}^3}}{700} = 0.018 \frac{\mu\text{g}}{\text{m}^3}$$

TN011⁵

Paint density = 21.2 lb/gal

Paint application rate = 0.25 gal/min

Spray time = 60 min/job

jobs/day = 2.5

MDI content = 5%

40% overspray

6.3% MDI emitted

Daily paint use limit [MDI 24-hr AAL = 0.18 µg/m³]:

$$\frac{0.25 \text{ gal paint}}{\text{min}} \times \frac{60 \text{ min}}{\text{job}} = \frac{15 \text{ gal paint}}{\text{job}} \times \frac{2.5 \text{ jobs}}{\text{day}} = 37.5 \frac{\text{gal paint}}{\text{day}} \times \frac{21.2 \text{ lb paint}}{\text{gal paint}} = \frac{795.0 \text{ lb paint}}{\text{day}}$$

$$\frac{795.0 \text{ lb paint}}{\text{day}} \times 5\% \text{ MDI} \times 40\% \text{ overspray} \times 6.3\% \text{ MDI emitted} = \frac{1.002 \text{ lb MDI emitted}}{\text{day}}$$

$$\frac{1.002 \frac{\text{lb MDI emitted}}{\text{day}}}{\frac{24 \text{ hr}}{\text{day}}} = \frac{0.0417 \text{ lb MDI emitted}}{\text{hr}}$$

$$\frac{\left(0.0417 \frac{\text{lb MDI emitted}}{\text{hr}} \times 126,000\right)}{60.41 \frac{\text{m}^3}{\text{sec}}} = \frac{87.06 \frac{\mu\text{g}}{\text{m}^3}}{700} = 0.12 \frac{\mu\text{g}}{\text{m}^3}$$

Annual paint use limit [MDI Annual AAL = 0.020 µg/m³]:

paint days per year = 55 [the equates to 5 days per week 11 weeks per year]

$$\frac{55 \text{ days}}{\text{yr}} \times \frac{2.5 \text{ jobs}}{\text{day}} = \frac{137.5 \text{ jobs}}{\text{yr}} \times \frac{15 \text{ gal paint}}{\text{job}} = 2,063 \frac{\text{gal paint}}{\text{yr}} \times \frac{21.2 \text{ lb paint}}{\text{gal}} = \frac{43,725 \text{ lb paint}}{\text{yr}}$$

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$$\begin{aligned} \frac{43,725 \text{ lb paint}}{\text{yr}} \times 5\% \text{ MDI} \times 40\% \text{ overspray} \times 6.3\% \text{ emitted} &= \frac{55.09 \text{ lb MDI emitted}}{\text{yr}} \\ \frac{55.09 \text{ lb MDI emitted}}{\text{yr}} \div 8760 \frac{\text{hr}}{\text{yr}} &= \frac{0.00629 \text{ lb MDI emitted}}{\text{hr}} \\ \left(\frac{0.00629 \text{ lb MDI emitted}}{\text{hr}} \times 126,000 \right) \div 60.41 \frac{\text{m}^3}{\text{sec}} &= \frac{13.12 \frac{\mu\text{g}}{\text{m}^3}}{700} = 0.019 \frac{\mu\text{g}}{\text{m}^3} \end{aligned}$$

MODELING

September 8, 2015 – modeling for a new paint (TN033) for Methyl isobutyl ketone (MIBK; CAS 108-10-1); this RTAP is also in TN029 but at a lower concentration (the potential emissions for MIBK assuming TN033 was being sprayed in all three bay areas were used) calculations submitted by the source were reviewed and some changes were made prior to submission to modeling (see spreadsheet Novel_15-0059_CalculationsReview.xlsx). No operating or use restrictions were needed for this RTAP (see modeling memo).

August 31, 2015 – modeling was requested by the Facility for two new paints (TN031 & TN032) for Hexamethylene diisocyanate (HDI, CAS 822-06-0). The total potential number of active spraying hours per day and per year was below the modeled maximum, no limits are required for this RTAP in the permit (see modeling memo).

October 29, 2012 – modeling was performed as a result of changes to Env-A 1400 adopted in 2010 which no longer allowed for the use of the De minimis or adjusted in-stack concentration methods to be used to demonstrate compliance for horizontal exhaust vents. Compliance was demonstrated for the following RTAPs:

14807-96-6	Talc (containing asbestos fibers)	8052-41-3	Stoddard solvent
13463-67-7	Titanium dioxide	1309-37-1	Iron Oxide
14808-60-7	Quartz	1314-13-2	Zinc oxide dust
100-41-4	Ethyl benzene	95-63-6	1,2,4-Trimethylbenzene (as Trimethylbenzene)
1330-20-7	Xylene (all isomers)	67-63-0	Isopropyl alcohol (2-Propanol)
71-36-3	n-Butanol	108-67-8	1,3,5-Trimethylbenzene (as Trimethylbenzene)
12001-26-2	Mica		

EMISSIONS TESTING

No emissions testing has been performed

COMPLIANCE STATUS

Emission Testing

No emission testing will be required during the permit term

Site Visits/Inspections

August 15, 2018 – full on-site compliance inspection was conducted; no deficiencies were noted

March 3, 2016 – full on-site compliance inspection was conducted; no deficiencies were noted

December 5, 2013 – Full on-site compliance inspection was conducted; the following issues have been corrected:

- The presence of a fourth spray gun - included in EU01 for spraying operations through a minor modification under Application # 14-0176 along with the correction to the stack heights from 15 ft a.g.s. to 21.4 ft a.g.s
- A Messer plasma arc cutting system had been installed - Information on this device was submitted under application 14-0034 to the department and reviewed. The plasma arc cutting system is not subject to Env-A 1400 since the emissions from the Torit baghouse exhaust back into the building. The application was withdrawn.
- Records documenting compliance with Env-A 1400 were not on file; an Env-A 1400 review was submitted by the source

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Reports & Fees

Annual emissions reports and fees have been received in a timely fashion

	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>
<u>Date Recvd.</u>	4/9/14	4/8/15	3/11/16	4/14/17	4/10/18

Semiannual and annual compliance certification reports –

<u>Year</u>	<u>Deviation & Monitoring Reports</u>			<u>MACT Standard Reports</u>	
	<u>Semiannual S1 due 7/31</u>	<u>Semiannual S2 due 1/31</u>	<u>Annual Compliance</u>	<u>Semiannual S1 due 7/31</u>	<u>Semiannual S2 due 1/31</u>
2013	Jul. 29, 2013	Jan. 31, 2014	Apr. 9, 2014	Jul. 29, 2013	Jan. 31, 2014
2014	Jul. 29, 2014	Jan. 26, 2015	Jan. 30, 2015	Jul. 29, 2014	Jan. 30, 2015
2015	Jul 29, 2015	Jan 27, 2016	Mar 11, 2016	Jul 29, 2015	Jan 27, 2016
2016	Jul 13, 2016	Jan 20, 2017	Apr 14, 2017	Jul 13, 2016	Jan 20, 2017
2017	Jul 27, 2017	Jan 25, 2018	Apr 5, 2018	Jul 27, 2017	Jan 25, 2018
2018	Jul 26, 2018	----	----	Jul 26, 2018	----

REVIEW OF REGULATIONS

State Regulations

Env-A 600 – Permitting (effective 10-22-16)

- 606.02(a)(4) – NOT Applicable – modeling was not required to demonstrate compliance with Env-A 1400 due to changes in exhaust stacks (installation of new stacks); compliance was demonstrated for actual emissions and for MDI with permit restrictions
- 607.01(a) – NOT Applicable – natural gas fired boilers and No 2 oil fired units are < 10MMBtu/hr
- 607.01(n) – Applicable – limiting its potential to emit to <50 tpy to be a synthetic minor for VOC and <10/25 for synthetic minor status for HAPs
- 607.01(t) – Applicable – restrictions needed to comply with AALs for MDI (CASRN 101-68-8)
- 607.01(u) – NOT Applicable – now synthetic minor HAP source therefore title V permit not required
- 607.01(v)(2) – NOT Applicable – source does not have a VOC RACT Order
- 607.01(y) – NOT Applicable – synthetic minor source of HAP

Env-A 900 – Owner or Operator Recordkeeping and Reporting Obligations (effective 11-18-16)

- 904.02 – Applicable – general VOC recordkeeping requirements
- 904.03 – Applicable – VOC recordkeeping for coating operations
- 907.01 – Applicable – general reporting requirements
- 907.02 – Applicable – annual emissions reporting requirements

Env-A 1200 – Volatile Organic Compounds (VOCs) Reasonable Available Control Technology (RACT) (effective 06-19-12)

- 1205.02 – Applicable – satisfy applicable emission rate limits by implementing a bubble
- 1212.01 – Applicable – VOC coating of miscellaneous metal parts with actual VOC emissions >3 tpy
- 1212.02 – Applicable – application methods of coatings
- 1212.03 – Applicable – work practice standards
- 1212.04(a) – Applicable – compliant coating as applied minus water & exempt compounds
- 1212.04(c) – Applicable – use of a bubble or comply with lb VOC/coating solids in Table 1212-2

Env-A 1300 – Nitrogen Oxides (NOx) Reasonably Available Control Technology (RACT) (effective 10-31-10)

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- 1301.02(d) – NOT Applicable – boilers/heaters do not exceed 50 MMBtu/hr, and potential is < 50 tpy of NOx

Env-A 1400 – Regulated Toxic Air Pollutants (effective 01-05-18)

- 1402.01(a) – the Facility has processes that emit RTAPs
- 1403.01 – the Facility must take restrictions on emissions of MDI (CASRN 101-68-8) to be in compliance with annual and daily AALs [this RTAP is currently only found in coatings TN010 and TN011]

Env-A 2000 – Fuel Burning Devices (effective 09-24-13)

- NOT Applicable – all fuel burning devices are below the permit applicability thresholds in Env-A 607.01

Env-A 2100 – Particulate Matter and Visible Emissions Standards (effective 04-23-13)

- 2102.01 – Applicable – particulate matter not exhausted out of the building using an exhaust system

Federal Regulations

40 CFR Part 60 – New Source Performance Standards (NSPS)

- Subparts Da, Db, Dc – Not applicable – fuel burning devices do not meet applicability criteria (they are all less than the applicable MMBtu/hr heat input criteria)

40 CFR Part 61 – National Emissions Standards for Hazardous Air Pollutants

- No applicable subparts

40 CFR Part 63 – National Emissions Standards for Hazardous Air Pollutants at Stationary Sources

Subpart MMMM – Surface Coating of Miscellaneous Metal Parts & Products

- §63.3881 – NOT Applicable – the source has taken enforceable limits to below the major source threshold for HAPs

Subpart DDDDD – Industrial, Commercial, and Institutional Boilers and Process Heaters

- §63.7480 – NOT Applicable – the source has taken enforceable limits to below the major source threshold for HAPs

Subpart XXXXXX – Nine Metal Fabrication and Finishing Source Categories

- §63.11514 – Applicable – the source is an area source of HAP and performs cutting, welding and painting of structural steel

The department has not taken delegation of this rule and so no applicable requirements have been placed into the permit. The Facility must assure compliance with all applicable requirements of the rule. For specific rule requirements see:

<http://www.epa.gov/ttn/atw/area/arearules.html>

Subpart JJJJJ – Industrial, Commercial and Institutional Boilers

- §63.11193 – NOT Applicable – the boiler fires natural gas

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Appendix A



Figure 1 – New paint area exhaust stacks

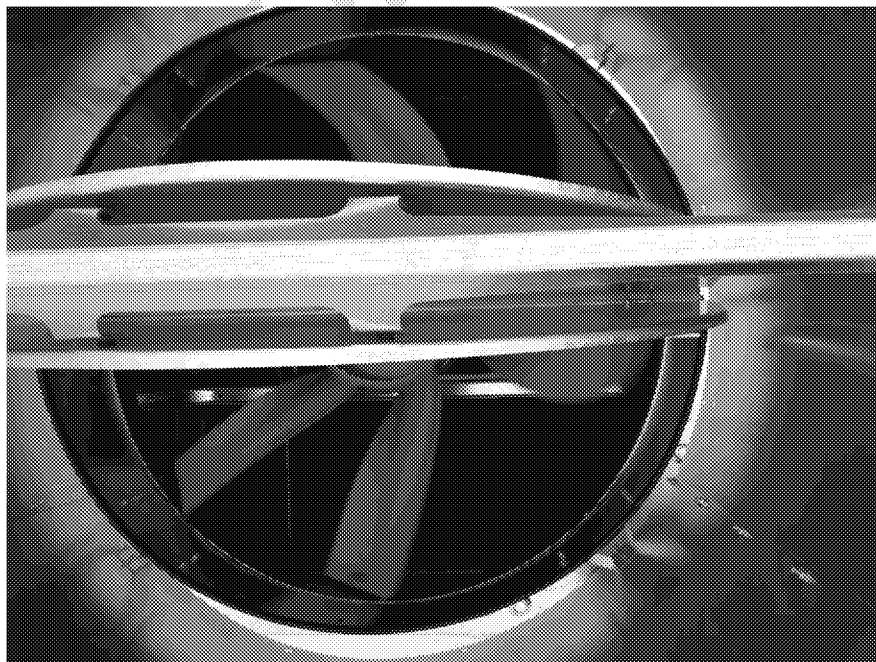


Figure 2 – Top view of a new stack